

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
District of Oregon

United States of America

v.

ISSA BARSHA, MARIAM GEVORKOVA,
LILIT GEVORKOVA, ARARAT MANUKYAN,
YEGISHE NAZARYAN, AKMALJON RADJAPOV,
DAVIT SUKIASYAN, GEVORG TASHCHYAN,
SHOKHRUKH TASHPULATOV

Case No.

6:18-MJ- 126-32

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 2015 - Present in the county of Benton in the
 District of Oregon, the defendant(s) violated:*Code Section**Offense Description*18 U.S.C. Sections 371, 1341,
1343, 1344

Conspiracy, Mail Fraud, Wire Fraud, and Bank Fraud

21 U.S.C. Sections 841(a)(1) and
846Manufacture, Distribution, or Possession with the Intent to Manufacture,
Distribute, or Dispense a Controlled Substance (Marijuana); Conspiracy to
Manufacture, Distribute, or Possess with the Intent to Distribute, a Controlled
Substance

This criminal complaint is based on these facts:

Please see attached affidavit written by FBI Special Agent Jeff Schiltz

☐ Continued on the attached sheet.*Complainant's signature*

Jeff Schiltz, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

6/11/18

City and state:

EUGENE, OR*Judge's signature*

Thomas M. Coffin, U.S. Magistrate Judge

Printed name and title

DISTRICT OF OREGON, ss: AFFIDAVIT OF JEFFREY SCHILTZ

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, Jeffrey Schiltz, being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent of the Federal Bureau of Investigation (FBI), United States Department of Justice, and have been employed in this capacity since July 2011. I am currently assigned to the Portland Division at the Eugene, Oregon Resident Agency. As a Special Agent, my responsibilities include the investigations of financial crimes and other violations of Federal laws, including Title 18 of the United States Code. More specifically, one of my functions is to investigate individuals engaged in financial transactions with proceeds derived from illegal activities, including investment fraud, mail and wire fraud, and money laundering. These investigations have not only focused on the underlying criminal activities, but also on the laundering of the proceeds from these illegal activities.

2. I submit this affidavit in support of a criminal complaint and arrest warrant for **Issa J. Barsha, Akmaljon Radjapov, Yeghishe Nazaryan, Mariam Gevorkova, Ararat Manukyan, Lilit Gevorkova, Shokhrukh Tashpulatov, Davit Sukiasyan, and Gevorg Tashchyan** for Conspiracy, Mail Fraud, Wire Fraud, and Bank Fraud, in violation of 18 U.S.C. §§ 371, 1341, 1343, and 1344, and Manufacture, Distribution, or Possession with the Intent to Manufacture, Distribute, Dispense a Controlled Substance (Marijuana) and Conspiracy to Manufacture, Distribute, or Possess with the Intent to Manufacture, Distribute, Dispense a Controlled Substance (Marijuana), in violation of 21 U.S.C. §§ 841(a)(1) and 846.

3. As set forth below, there is probable cause to believe, and I do believe, that **Issa J. Barsha, Akmaljon Radjapov, Yeghishe Nazaryan, Mariam Gevorkova, Ararat Manukyan,**

Lilit Gevorkova, Shokhrukh Tashpulatov, Davit Sukiasyan, and Gevorg Tashchyan committed Conspiracy, Mail Fraud, Wire Fraud, and Bank Fraud, in violation of 18 U.S.C. §§ 371, 1341, 1343, and 1344, and Manufacture, Distribution, or Possession with the Intent to Manufacture, Distribute, Dispense a Controlled Substance (Marijuana) and Conspiracy to Manufacture, Distribute, or Possess with the Intent to Manufacture, Distribute, Dispense a Controlled Substance (Marijuana), in violation of 21 U.S.C. §§ 841(a)(1) and 846.

4. The facts set forth in this affidavit are based on the following: my own personal knowledge; knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers; interviews of witnesses; my review of records related to this investigation; communications with others who have knowledge of the events and circumstances described herein; and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of this criminal complaint and arrest warrant, it does not set forth each and every fact that I or others have learned during the course of this investigation.

Applicable Law

5. Title 18, U.S.C. § 371 provides, in part, that if two or more persons conspire either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose, and one or more of such persons do any act to effect the object of the conspiracy, each shall be fined under this title or imprisoned not more than five years, or both

6. Title 18, U.S.C. § 1341 provides, in part, that whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by

means of false or fraudulent pretenses, representations, or promises, and for the purpose of executing such scheme or artifice or attempting so to do, places in any post office or authorized depository for mail matter, any matter or thing whatever to be sent or delivered by the Postal Service, or deposits or causes to be deposited any matter or thing whatever to be sent or delivered by any private or commercial interstate carrier, or takes or receives therefrom, any such matter or thing, or knowingly causes to be delivered by mail or such carrier according to the direction thereon, or at the place at which it is directed to be delivered by the person to whom it is addressed, any such matter or thing, shall be fined under this title or imprisoned not more than 20 years, or both.

7. Title 18, U.S.C. § 1343 provides, in part, that whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, shall be fined under this title or imprisoned not more than 20 years, or both.

8. Title 18, U.S.C. § 1344 provides that whoever knowingly executes, or attempts to execute, a scheme or artifice (1) to defraud a financial institution; or (2) to obtain any of the moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of, a financial institution, by means of false or fraudulent pretenses, representations, or promises; shall be fined not more than \$1,000,000 or imprisoned not more than 30 years, or both.

9. Title 21, U.S.C. § 841(a)(1) provides that it shall be unlawful for any person knowingly or intentionally to manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance.

10. Title 21, U.S.C. § 846 provides that any person who attempts or conspires to commit any offense defined in this subchapter shall be subject to the same penalties as those prescribed for the offense, the commission of which was the object of the attempt or conspiracy.

Statement of Probable Cause

11. In December 2016, the United States Postal Inspection Service (USPIS) and the Federal Bureau of Investigation (FBI) initiated an investigation concerning a credit card “bust-out” fraud perpetrated by individuals residing in the Corvallis, Oregon area. A credit card “bust-out” refers to a fraud scheme in which the perpetrators obtain credit cards for the purpose of making purchases and running up large balances with no intent to pay the amount owed. Bust-out schemes often include making initial payments on the credit cards in order to make the cards appear legitimate, often leading to an increase in the credit limit. After making credit card purchases, payments are made to the cards from co-conspirator bank accounts that reduce the outstanding balances, allowing for additional purchases. After numerous purchases and payments are made, the co-conspirators report to their financial institution that the payments made to the cards were not authorized. The banks seek and obtain reimbursement from the card company and deposit those funds back into the account of the co-conspirator. No further payments are made on the credit cards, which results in losses to the financial institutions that are often substantially greater than the amount of the credit limit.

12. As detailed below, this investigation has established that proceeds from the credit

card bust-out were used to establish and operate a marijuana grow and retail sales business in Corvallis, Oregon, and that some of the marijuana grown in Corvallis has been transported and sold outside the state of Oregon. Based on the allegation of interstate marijuana sales, Drug Enforcement Administration (DEA) Special Agent (SA) Andrew Hsia joined this investigation.

13. SA Hsia attended the Drug Enforcement Academy where he received basic and specialized training from the DEA. Over the last 4 years, he has investigated over 40 drug trafficking cases. As a result of training and experience, he is familiar with the methods and techniques employed by traffickers of controlled substances to obfuscate and disguise their illicit activity.

O.J. Arrest

14. On June 6, 2017, an Uncharged Co-Conspirator (“UCC”), hereinafter referred to as O.J., was arrested by the Corvallis Police Department (CPD) for Menacing and Unlawful Use of a Weapon. The arrest followed a complaint filed by **Issa Barsha** alleging that O.J. had a gun in his possession and threatened to shoot **Barsha**. After receiving the complaint, CPD officers and detectives responded to **Barsha’s** address, 5945 SW Philomath Blvd., Corvallis, Oregon. Upon arriving at the residence, CPD observed a white Maserati attempting to pull out of the driveway. CPD identified the occupants of the vehicle as **Shokhrukh Tashpulatov, Yeghishe Nazaryan, and Akmaljon Radjapov**. **Radjapov** informed CPD he lived at the residence with **Barsha**. **Radjapov** told CPD that O.J. had a gun and threatened to shoot everyone if he wasn’t paid money that he believed he was owed. CPD ordered O.J. to come out of the residence. O.J. threw a handgun out the front door and exited the residence. He was placed under arrest and transported to CPD.

15. CPD determined that **Barsha** was inside the residence with O.J. at the time he was arrested. **Barsha** informed CPD that he lived at the residence. **Barsha** told CPD that O.J. threatened to kill him if he did not pay O.J. the money he was owed. **Barsha** told CPD that he did owe O.J. money, but he did not say why. O.J. demanded payment immediately. When **Barsha** told O.J. that he did not have the money, O.J. threatened to shoot everyone. **Barsha** then called CPD.

16. Following his arrest, O.J. told CPD that those at the residence are involved in large-scale frauds and he agreed to be part of it. O.J. said he was promised money from **Barsha** but was never paid. O.J. told CPD that he wanted to talk to the FBI about the fraud.

17. On June 7, 2017, O.J. was interviewed at CPD by the Federal Bureau of Investigation (FBI) and the United States Postal Inspection Service (USPIS). O.J. was verbally advised of his Advice of Rights. O.J. stated that he understood his Rights, and he agreed to talk to the investigators.

18. O.J. stated that he lives at 5945 SW Philomath Blvd., Corvallis, Oregon, with **Issa Barsha, Akmaljon Radjapov**, and another individual. O.J. stated that he is involved in a large-scale credit card fraud with **Barsha, Radjapov**, and several others. **Barsha and Radjapov** coordinate all the fraudulent credit card transactions. E. LNU (Last Name Unknown) is the bookkeeper. Further investigation identified E. LNU as UCC E.M.

19. O.J. stated that UCC A. LNU, who lives in Hollywood, California, recruits Armenian people who are struggling to give their personal information in return for money. Their personal information is used to obtain credit cards. Once the credit card is issued, **Barsha and Radjapov** start "hitting" the credit card with purchases up to the credit limit. Money is then

transferred from a “fraudulent” account to pay the balance, and the credit cards are charged again up to the credit limit. The account that made the payment is reported to be fraudulent, and the funds are returned to the account. **Barsha** and **Radjapov** use their laptop computers to conduct the fraud.

20. **Barsha** used proceeds from the credit card fraud to start a marijuana grow operation in a warehouse located on 3rd Street in Corvallis, Oregon. Everything used to support the marijuana grow, including rent for the warehouse and purchases at Lowes, Home Depot, Corvallis Hydro and Samurai Grower Supply, was paid for with fraudulent credit cards. **Barsha** and **Radjapov** also paid the rent at their residence, 5945 SW Philomath Blvd., Corvallis, Oregon, using the fraudulent credit cards.

21. O.J. stated that an individual, hereinafter referred to as A.G., owns the 3rd Street warehouse in Corvallis. A.G. also owns property located at 220 NW 2nd Street, Corvallis, Oregon. **Mariam Gevorkova** and **Yeghishe Nazaryan** own the Corvallis Cannabis Club, which is located at 220 NW 2nd Street, Corvallis, Oregon. **Mariam Gevorkova** and **Nazaryan** are also involved in the credit card fraud. **Mariam Gevorkova’s** sister, **Lilit Gevorkova**, and her husband, identified as **Ararat Manukyan**, work at the Corvallis Cannabis Club and are also involved in the credit card fraud. **Barsha** uses fraudulent credit cards to pay rent at the 3rd Street warehouse, and **Nazaryan** uses fraudulent credit cards to pay rent at 220 NW 2nd Street.

22. O.J. stated that **Barsha**, **Radjapov**, **Mariam Gevorkova** and **Nazaryan** use the fraudulent credit cards to purchase furniture from Furniture Exchange, jewelry and cigarettes and then sell the merchandise for half price. Some of the jewelry and gold purchased with the fraudulent credit cards was delivered to **Barsha’s** residence.

23. O.J. stated that he provided his personal information to **Barsha**, who obtained credit cards in O.J.'s name. In addition, charges on the fraudulent credit cards were paid to "O.J. Limousine Service," a company in O.J.'s name based in California.¹ The deposits into the O.J. Limousine Service account were withdrawn in cash by **Barsha** and **Radjapov**, who both had his account "PIN" number. They withdrew approximately \$100,000 from O.J. Limousine Service accounts and then directed O.J. to report someone stole his information and fraudulently withdrew the funds from his account. O.J. stated that **Barsha** conducted the same fraud with NUR Limousine, a company owned by **Barsha**. O.J. advised that NUR Limousine is a fake company.²

24. O.J. stated that he delivered cash three times, approximately \$5,000 each time, to UCC A.A. from **Barsha** and **Radjapov**. The cash was to pay A.A. for his participation in the credit card fraud scheme.

25. O.J. stated that some of the marijuana grown at the 3rd Street warehouse is sold out of state. He stated that **Barsha** has a connection in Chicago, and "Shok," identified as **Shokhrukh Tashpulatov**, has a Vietnamese connection in California. O.J. stated that **Shok**, who was at the residence at the time O.J. was arrested, is the "master marijuana grower." O.J. stated that **Shok** and his wife live together in Corvallis.

26. O.J. stated that the marijuana is packaged at Corvallis Cannabis Club, which is located at 220 NW 2nd Street, Corvallis, Oregon, 97330. The marijuana is vacuum-sealed and

¹ I have reviewed State of California Secretary of State records relating to O.J.'s Limousine and O.J.'s Limo. I found no records relating to either entity.

² I have reviewed State of California Secretary of State records relating to NUR Limousine Service. NUR Limousine Service was established as a Limited Liability Company (LLC) by Issa Joseph Barsha on April 30, 2014. The business is described as "Transportation."

placed into suitcases and driven out of state. The money is then deposited into different bank accounts.

27. O.J. viewed a photograph of an individual taken by surveillance cameras at Lowe's store in Albany, Oregon, where one of the fraudulent credit cards was utilized. O.J. identified the individual as UCC D.M., also known as Tony. Tony is a partner in the marijuana grow with **Nazaryan**. Tony has made purchases at Lowe's and Home Depot using fraudulent credit cards. Tony travels nationwide to sell marijuana.

28. O.J. stated that on April 24, 2017, he drove with **Barsha** to Chicago to deliver sixty pounds of marijuana. After receiving the money for the marijuana, **Barsha** deposited some of the money into Chase Bank through ATM deposits, and flew back with approximately \$30,000.

Credit Card Fraud Investigation

29. As previously stated, the credit card bust-out investigation was initiated in December 2016, six months prior to O.J.'s arrest. The investigation was based on Synchrony Bank reporting a loss in the amount of approximately \$171,808 as a result of the fraudulent use of eight credit cards issued to "Yana K.," an individual allegedly residing in Corvallis, Oregon. Following the initial report from Synchrony Bank, several additional financial institutions reported similar activity relating to several additional individuals allegedly residing in and around Corvallis. Financial institutions included Synchrony Bank, Discover Bank, Capital One Bank, Citibank, U.S. Bank, Bank of America, Wells Fargo, Chase Bank, Comenity Bank, and Oregon State Credit Union. The individuals identified as suspects by the financial institutions were the same individuals named by O.J.

30. This investigation has determined that the following individuals, in addition to unnamed and unidentified co-conspirators, knowingly participated in the credit card bust-out conspiracy that was used to fund an illicit interstate marijuana operation:

- a. **Issa J. Barsha and Akmaljon Radjapov.** Investigation has determined that, until recently, Barsha and Radjapov resided at 5945 SW Philomath Blvd., Corvallis, Oregon, 97333.
- b. **Yeghishe Nazaryan, Mariam Gevorkova, Ararat Manukyan, and Lilit Gevorkova.** Investigation has determined that Nazaryan, Mariam Gevorkova, Manukyan, and Lilit Gevorkova reside at 2547 NW Acey Way, Corvallis, Oregon, 97330.
- c. **Shokhrukh Tashpulatov.** Investigation has determined that Tashpulatov resides at 2664 NW Garryanna Drive, Apt 2, Corvallis, OR 97330.
- d. **Davit Sukiasyan and Gevorg Tashchyan.** Investigation has determined that Sukiasyan and Tashchyan, reside at 1115 SW Stopp Pl, Corvallis, Oregon, 97333.

31. As described more fully in this affidavit, the individuals above devised a scheme to defraud that involved opening fraudulent credit card accounts and using bank accounts at federally insured institutions to reduce the outstanding balances, allowing for additional purchases, and eventually clawing back those payments by reporting them as unauthorized. The defendants used, or caused to be used, interstate wire communications and the mails to carry out or attempt to carry out essential parts of the scheme. The statements, actions, and omissions of the defendants were material, and resulted in losses to the financial institutions of over \$1,000,000. The steps taken to open the credit card accounts and use the proceeds to fund the

marijuana operation were overt acts in furtherance of the conspiracy.

Synchrony Bank Fraud

32. Synchrony Bank, based in Draper, Utah, issues credit cards, including Visa, MasterCard and Private Label Credit Cards (PLCC). PLCC credit cards are issued in the name of retail clients, including Lowe's and Amazon.

33. On November 18, 2016, Synchrony Bank reported that Yana K. perpetrated a credit card fraud resulting in a loss to Synchrony Bank in the amount of approximately \$171,808. Eight credit card accounts were opened in Yana K.'s name. Upon the opening of each account, a credit card was mailed to the address provided in the application. All of the accounts were opened using an address of 260 NW 1st St., Corvallis, OR 97330. Six of the credit cards were applied for online using IP address 75.145.73.58. This IP address was assigned to a Comcast account located at 220 NW 2nd St., Corvallis, Oregon, 97330.

34. Investigation has determined that Yana K. is twenty-six-year-old female and citizen of Ukraine. International travel records revealed that Yana K. was not in the United States at the time the credit cards were applied for or issued in her name.

35. Investigation at 220 NW 2nd Street, Corvallis, Oregon, revealed a marijuana retail business named Corvallis Cannabis Club. Oregon Secretary of State Records revealed that on April 17, 2015, the Assumed Business Name "California Cannabis Club" was registered in Oregon with an address of 220 NW 2nd Street, Corvallis, Oregon, 97330. The authorized Representative was **Marina Gevorkova**, 980 NE Walnut Blvd., apt D104, Corvallis, Oregon. On September 23, 2015, an amendment was filed changing the name to the "Corvallis Cannabis Club." The printed name of the Authorized Representative filing the amendment was **Marina**

Gevorkova, who signed the amendment **Mariam Gevorkova**. Investigators believe that the name “**Marina**” is one of the alias used by **Mariam Gevorkova**

36. On April 4, 2016, Articles of Incorporation were filed in Oregon for the Corvallis Cannabis Club, Inc., with an address of 220 NW 2nd Street, Corvallis, Oregon, 97330. The Chief Financial Officer was listed as UCC M.H. A handwritten note on the bottom of the Articles of Incorporation states, “Per P/C W/ Marina 4/4/16,” indicating that **Gevorkova** was aware of the change to a corporation. On March 23, 2017, an Amended Annual report for Corvallis Cannabis Club was filed listing the Registered Agent and CEO as **Ararat Manukyan** and the president as M.H. On February 27, 2018, an Amended Annual Report for the Corvallis Cannabis Club listed **Lilit Gevorkova** as the CEO, M.H. as President and Secretary, and **Ararat Manukyan** as the Registered Agent, all at 220 NW 2nd Street, Corvallis, Oregon.

37. Charges on Yana K.’s Amazon credit card include over \$20,000 purchased from Amazon. Items purchased from Amazon were shipped to **Mariam Gevorkova**, **Marina Gevorkova**, and **Yeghishe Nazaryan**. A majority of the purchases were shipped to **Mariam Gevorkova** at 220 NW 2nd Street, Corvallis, Oregon, 97330. The email address listed for all purchases was m*****g***@gmail.com. This is the same email that **Mariam Gevorkova** provided to Bank of America as her email address.

38. On June 4, 2016, a \$9,485.51 charge on Yana K.’s Amazon card was paid to Amazon for the purchase of a Hublot Black Dial Diamond Ladies Watch. Amazon records revealed that the customer name was listed as “**Marine Gevorkova**,” the billing name was listed as “Yana K.,” and the shipping name was listed as “**Mariam Gevorkova**.” On June 7, 2016, the watch was shipped to **Mariam Gevorkova**, 220 NW 2nd Street, Corvallis, Oregon, 97330.

39. Charges on Yana K.'s credit cards include payments to NUR Limousine Service, a company owned by **Barsha**, and O.J.'s Limousine, a company owned by O.J. Charges to Yana K.'s TJ Maxx credit card include a \$760 payment to NUR Limousine, a \$3,000 payment to O.J.'s Limousine and a \$720 payment to O.J.'s Limousine. Charges to Yana K.'s Toys R Us credit card include a \$4,700 payment to NUR Limousine. These charges are not consistent with expected payments for limousine service. The payments corroborate O.J.'s statement that the fraudulent credit cards were used to make payments to companies owned by **Barsha** and O.J.

40. Yana K.'s credit cards were also used to make payments to Pacific Power for utility service. In June 2016, Yana K.'s Toys R Us credit card made a \$2,104.95 payment to Pacific Power for service at 250 NW 1st Street, Corvallis, Oregon. In June 2016, Yana K.'s TJ Maxx credit card made a \$4,504.95 payment to Pacific Power for service at 250 NW 1st Street, Corvallis, Oregon. Pacific Power records revealed that service at 250 NW 1st Street, Corvallis, Oregon, is in the name of **Yeghishe Nazaryan**.

41. Yana K.'s Lowes credit card was issued on March 9, 2016, with a \$30,000 credit limit. On April 4, 2016, **Yeghishe Nazaryan** was added as a purchaser on the account. Between May 24, 2016 and June 6, 2016, over \$29,000 was charged on the card. Charges include payments to Lowe's in Albany, Oregon for "whitewood & fir studs, tools, large body nailers and contractor Air compressor." These items are consistent with items needed for a construction project, including establishing a marijuana grow as described by O.J. No payments were made on the card. On January 13, 2017, Synchrony Bank charged off the account with a \$29,823.58 loss.

42. Between July 8, 2016 and August 30, 2016, Synchrony Bank received forty-one

payments on the Yana K. credit cards totaling approximately \$108,641, including approximately \$77,810 from a Wells Fargo Bank account in the name of O.J., and \$30,831 from unknown bank accounts. The payments reduced the balance on the credit cards allowing for additional charges on the cards. O.J. reported that the payments were unauthorized, and, with the exception of a single \$2,000 payment, Synchrony Bank reimbursed Wells Fargo Bank for the payments made on Yana K.'s credit cards from O.J.'s account. This is consistent with O.J.'s statements regarding being told to report the payments as fraudulent.

43. Synchrony Bank initiated collection efforts and attempted to contact Yana K. Synchrony Bank was unable to contact Yana K., and the eight accounts were written off resulting in a loss in the amount of approximately \$171,808.

Additional Fraudulent Synchrony Bank Credit Card Accounts

44. On April 17, 2017, Synchrony Bank reported additional fraudulent credit card transactions that appeared to be related to the fraud perpetrated by "Yana K." based on similar addresses, credit card charges and payments returned unpaid. These included cards issued to the following individuals: A.A., **Issa Barsha**, Liubov G., Anna K., Andrea M., Anna M., Tatyana R., and Anastasia S.

45. The address listed for the credit cards issued to Andrea M., Anna M., Tatyana R., and Anastasia S. was the same address provided to Synchrony Bank for Yana K., 260 NW 1st St., Corvallis, Oregon. Liubov G.'s address was listed as 220 NW 2nd Street, Corvallis, Oregon, the address of the Corvallis Cannabis Club. Anna K.'s listed address on a Lowe's credit card application was 980 NE Walnut, Apt. 104, Corvallis, Oregon, 97330, which is **Mariam Gevorkova's** previous address. The credit card activity was consistent with Yana K.'s in that

the subjects obtained the credit cards, made charges up to or near the credit limit, and all payments made on the cards were subsequently returned unpaid. Losses to Synchrony Bank total approximately \$421,250.

A.A. Synchrony Credit Cards

46. As stated above, A.A. is an uncharged member of conspiracy who opened numerous credit cards in his own name, including credit cards from Synchrony Bank.

47. Charges on the credit cards include payments to NUR Limousine Service and O.J.'s Limousine Service. A.A.'s Chevron credit card had a \$4,000 credit limit. Charges include a \$1,950 payment to NUR Limousine on June 28, 2016, and a \$2,000 payment to O.J.'s Limousine on July 6, 2016. No payments were made on the card, and the account was charged off with a \$3,950 loss.

48. A.A.'s Stash Hotel credit card had an \$8,000 credit limit. Charges include three payments O.J.'s Limousine, including \$700 payment on June 21, 2016; \$2,300 on June 23, 2016; and \$4,980 on June 24, 2016. No payments were made on the card resulting in a \$7,980 loss.

49. The payments to O.J.'s Limousine were processed by Elavon, a credit card processor, and deposited into a Bank of America account in the name of O.J.'s Limousine. O.J. had sole signature authority on the account. Following the deposits, O.J. transferred funds to a Bank of America account in the name of NUR Limousine, and those funds were withdrawn in cash. **Issa Barsha** had sole signature authority on the account.

Andrea M. Synchrony Credit Cards

50. On June 21, 2016, Andrea M. was issued a Lowe's credit card with a \$25,000 credit limit. Investigation has determined that at the time Andrea M. applied for the credit card,

she was a twenty-three-year-old female and a citizen of Macedonia. International travel records revealed that Andrea M. has not been in the United States since 2014, and she was not in the United States at the time the credit cards were issued in her name.

51. Andrea M.'s Lowe's credit card was first used on September 15, 2016. Between September 15 and September 26, there were charges totaling \$24,911.48. Charges include payments to Lowe's stores in Pomona, California, Albany, Oregon, and Salem, Oregon. Purchases include foam sheathing, fir studs, screen doors, Whirlpool freezers, washers and dryers, electrical wire, air compressors, paint and vacuums. The purchases related to construction including six panel doors, jet pumps, dehumidifiers, moisture resistant gypsum and tools.

52. Between September 26, 2016 and November 24, 2016, online payments totaling \$78,953 were posted to the account. The payments reduced the balance due and allowed for additional purchases. The payments were reported to be unauthorized, and on November 29, 2016, all payments were returned resulting in a charge off in the amount of \$92,356.98 in purchases and \$12,095.53 in unpaid interest. One of the bank accounts that made \$59,903 in payments to Andrea M.'s credit card was opened in the name of an uncharged coconspirator, who is a known associate of **Issa Barsha**.

53. USPIS contacted Lowe's in Albany, Oregon and was advised that merchandise purchased using Andrea M.'s credit card at Lowe's was delivered to 260 NW 1st St., Corvallis, Oregon, and 2394 NW Hummingbird Drive, Corvallis, Oregon. At the time of the deliveries, **Nazaryan, Mariam Gevorkova, Lilit Gevorkova and Manukyan** lived at 2394 NW Hummingbird Drive, Corvallis, Oregon.

54. Investigation at 260 NW 1st Street, Corvallis, Oregon, revealed that this address is a single commercial building located in downtown Corvallis. The address “250” is on the southeast corner of the building, and “280” is on the northeast corner of the building. There is an entry door on the southeast side of the building with two mail slots. The number “250” is above the slot on the left, and “260” is above the slot on the right. Mail addressed to 250 NW 1st Street is deposited in the mail slot on the left, and mail addressed to 260 NW 1st Street is deposited in the mail slot on the right. Mail addressed to 280 NW 1st Street is delivered to the door on the northeast corner. Pacific Power records revealed that **Yeghishe Nazaryan** established utility service at 250 NW 1st Street, Corvallis, Oregon on October 26, 2015. There are no separate utility accounts established for either 260 or 280 NW 1st Street.

Discover Bank Fraud

55. Discover Bank issued credit cards to six of the same individuals who received Synchrony Bank credit cards. Discover cards were issued to A.A., Andrea M., Tatyana R., Anna M., Anastasia S., and **Issa Barsha**. The credit card activity was consistent with the Synchrony Bank credit cards. Charges were made up to or near the credit limit, payments were made reducing the balance and allowing for additional purchases, the payments were reported to be unauthorized and payments were returned unpaid.

56. The listed address for Andrea M., Anna M., Tatyana R., and Anastasia S. was 260 NW 1st Street, Corvallis, Oregon, the same address that was listed in the Synchrony Bank credit cards. Upon the opening of each account, a credit card was mailed to the address provided in the application.

Anastasia S. Discover Card

57. Investigation has determined that Anastasia S. is a thirty-three-year-old female and a citizen of Russia. International travel records revealed that Anastasia S. has not been in the United States since 2007, and she was not in the United States at the time the credit cards were applied for or issued in her name.

58. The credit limit on Anastasia S.'s Discover card was \$6,500. Between September 10, 2016, and September 26, 2016, over \$26,000 was charged to the card. The charges were approved due to several phone payments that reduced the amount owed below the credit limit. Charges include \$3,804.95 for a payment to Pacific Power for service at 250 NW 1st Street, Corvallis, Oregon, in the name of **Yeghishe Nazaryan**, and two payments to Furniture Exchange for \$4,500.00 and \$5,900.00.

59. Investigation revealed that several of the credit cards made large payments to Furniture Exchange and another business, Wallbeds Unlimited. Oregon Secretary of State Records revealed that Furniture Exchange LLC and Wallbeds Unlimited are owned by A.G. The address for both entities is listed as 250 NW 1st Street, Corvallis, Oregon. Investigation has determined that the payments to Furniture Exchange and Wallbeds are for rent at the properties owned and/or managed by A.G., including 250 NW 1st Street, Corvallis, Oregon, 220 NW 2nd Street, Corvallis, Oregon and the 3rd Street warehouse in Corvallis, Oregon. A.G. is aware that tenant payments are being made with credit cards in the name of multiple individuals. A.G. reported to his merchant credit card processor that, "some of the tenants would like to use credit cards...we have no control over what card they use or how much they want to pay."

60. There were four phone payments on Anastasia S.'s Discover card in the amount

of \$4,824.95, \$4,790.55 and \$4,550.75 that were made from a Capital One bank account in the name of **Issa Barsha**, and one payment in the amount of \$6,461.00 was made from a Bank of America account in the name of an unidentified coconspirator. On September 27, 2016, the four payments totaling \$20,627.25 were reported to be unauthorized and returned unpaid. No further payments were made on the card. Discover made several attempts to contact Anastasia S. concerning the unpaid balance, including sending letters to her listed address, 260 NW 1st Street, Corvallis, Oregon 97330. Discover's attempts were unsuccessful. On May 31, 2017, the account was charged off with a \$26,897.53 loss.

A.A. Discover Card

61. As stated above, A.A. is a member of the conspiracy who opened numerous credit cards in his own name, including credit cards from Discover Bank.

62. The credit limit on A.A.'s Discover card was \$7,500.00. Between June 17, 2016, and September 15, 2016, over \$53,000.00 was charged to the card. The charges were approved due to several phone payments that reduced the amount owed. Charges include sixteen payments to O.J.'s Limousine totaling \$34,880. As stated above, O.J. stated that A.A. was paid by **Barsha** and **Radjapov** for his participation in the fraud.

63. Investigation determined that the phone payments on A.A.'s card were made from two Citibank accounts in the name of O.J. and a Bank of America account in the name of **Shokhrukh Tashpulatov** DBA Shokhrukh Tashpulatov Sales. All payments were reported to be unauthorized and returned unpaid. Discover made several unsuccessful attempts to contact A.A. concerning the unpaid balance. On April 30, 2017, the account was charged off with a \$37,478.34 loss.

64. A review of **Shokhrukh Tashpulatov's** Bank of America account revealed that, in addition to making payments on A.A.'s Discover card, payments were also made to Discover for cards in the name of Tatyana R. and Andrea M., to Capital One for a card in the name of Tatiana R., to Comenity Bank for a card in the name of Anna M., and to Macy's and Bloomingdales for cards in the name of A.A. All payments were reported to be unauthorized, and **Tashpulatov's** account was credited with the reversed payments. Following the credits, **Tashpulatov** transferred \$57,659.93 to a Bank of America account in the name of **Akmaljon Radjapov**.

Issa Barsha Discover Card

65. On September 26, 2016, a Discover card was issued to **Issa Barsha**. The credit card had a \$4,500 credit limit.

66. On December 6, 2016, the balance on the account was \$4,399.45. On the same day, a \$4,349.45 internet payment was posted to the account.

67. Between December 13, 2016, and January 2, 2017, there were five charges payable to a company, My Truck My Load, in the amount of \$4,450.00, \$4,230.00, \$4,450.00, \$4,480.00, \$4,490.00. After each charge there was an internet payment which reduced the balance on the Discover Card and allowed for additional charges.

68. Charges on the Discover Card in January 2017 included \$4,500.00 to Furniture Exchange and three payments to Corvallis Hydroponics, Corvallis, Oregon, in the amount of \$4,500, \$4,500.00 and \$4,500.00. On January 30, there was an additional \$4,500.00 payment to My Truck My Load. After each charge there was an internet payment allowing for additional purchases.

69. On February 1, 2017, all of the internet payments were reversed resulting in a \$62,280.75 balance owed. No further payments were made on the card resulting in a charge-off in the amount of \$66,512.12, including interest.

70. Investigation has determined that all of the internet payments posted to **the Issa Barsha** Discover card account were paid from a Chase Bank account in the name of E.M. As stated above, O.J. described E.M. as **Barsha** and **Radjapov's** bookkeeper.

71. On February 1, 2017, E.M. filed a claim stating that the payments were unauthorized. On January 31 and February 1, 2017, E.M.'s Chase account received thirty-seven credits totaling over \$116,000 based on E.M.'s allegation of unauthorized withdrawals. The credits included all of the payments on **Barsha's** Discover card, as well as credits from additional Bank of America and Citibank credit cards. Following the credits, a majority of the funds were withdrawn in cash.

72. A review of E.M.'s Chase bank account revealed that, prior to making the payments on **Barsha's** Discover card, cash was deposited into E.M.'s account in Corvallis, Albany, and Salem, Oregon. Between November 25, 2016, and February 1, 2017, \$67,850 in cash was deposited into E.M.'s account in Oregon, which provided the funds to make the payments on **Barsha's** Discover card.

73. A review of **Barsha's** Capital One bank account revealed that cash was withdrawn from the account at the same Chase branch where cash deposits were made into E.M.'s Chase account. For example, **Barsha** withdrew \$5,000 on December 4 and \$5,000 on December 7, 2016, from his Capital One bank account via debit card transactions at a Chase Bank branch on Kings Boulevard in Corvallis. On December 7, 2016, \$9,200 cash was

deposited into E.M.'s Chase account at the same Chase branch on Kings Boulevard in Corvallis. The deposits into E.M.'s Chase account provided the funds to make the phone payments on **Barsha's** Discover card in the amount of \$4,349.45 on December 6 (that posted to E.M.'s account on December 8) and \$4,450.00 on December 10.

74. A review of **Barsha's** Capital One account also revealed that at the same time his Discover card was making payments to My Truck My Load, **Barsha** was receiving checks from My Truck My Load that were deposited into his Capital One account. **Barsha** deposited checks from My Truck My Load in the amount of \$30,250 on December 11, 2016, and \$39,255 on December 14, 2016.

S.M. Discover Card

75. On September 10, 2016, Discover issued a credit card to UCC S.M. The credit limit was \$18,000. The first charge on the card was \$875.92 paid to Corvallis Hydroponics on October 4, 2016. Additional charges were made on the card, and S.M. reported that his card was compromised and he was issued a new Discover card.

76. On February 6, 2017, a Bank of America account in the name of **Davit Sukiasyan** was added as a payee on the account allowing **Sukiasyan's** Bank of America account to make payments on S.M.'s Discover card. Prior to adding the account, Discover contacted Bank of America with S.M. and **Sukiasyan** on the phone and confirmed the account belonged to **Sukiasyan**, who was represented to be S.M.'s son.

77. Between January 30, 2017 and March 10, 2017, charges on S.M.'s card totaled approximately \$56,544.77. There were nine payments from **Sukiasyan's** Bank of America account totaling approximately \$58,700, which reduced the balance and allowed for additional

purchases. During this time period, S.M.'s Discover account was accessed online at Discover.com from IP address 71.63.212.198, which is assigned to a Comcast customer in Corvallis, Oregon.

78. Charges on S.M.'s Discover card include \$9,420 to My Truck My Load on February 1, \$10,000 to Furniture Exchange on February 21, \$4,500 to Corvallis Hydroponics on February 23, two payments to Terwilliger Partners, a former marijuana dispensary, in the amount of \$1,360 and \$2,722 on February 27, \$9,417 to Furniture Exchange on February 28, \$5,004.95 to Pacific Power for service at 250 NW 1st Street, Corvallis, on February 22, and \$3,000 to Terwilliger Partners on March 1.

79. On March 7, 2017, Discover closed S.M.'s account after all payments from **Davit Sukiasyan's** Bank of America account were reported as being unauthorized. No further payments were made on the account resulting in a loss in the amount of approximately \$57,898.53.

80. A review of **Davit Sukiasyan's** Bank of America account revealed that the account was opened on November 30, 2016. In order to provide the funds to make the payments on S.M.'s Discover card, there were eleven cash deposits between February 7, 2017 and March 6, 2017 totaling \$64,505. The deposits were made in several Bank of America branches, including Corvallis, Oregon, and Burbank and Glendale, California. Identified individuals making the deposits include "**Marim**" **Gevorkova** and E.M.

81. In summary, all of the Discover cards listed above made large purchases on the cards followed by payments that reduced the balance owed. Large purchases occurred after the payments were made, but before the payments were returned unpaid resulting in balances that

significantly exceeded the credit line once the payments returned. Following the return of the payments, no further payments were made and all of the accounts were closed with substantial losses to Discover.

Capital One/Citibank Fraud: Karlen H.

82. On July 14, 2017, **Gevorg Tashchyan** opened a Bank of America checking account in Corvallis, Oregon, account number ending in 1870. **Tashchyan** listed his address as 1115 SW Stopp Place, Corvallis, Oregon. Between September 1, 2017 and October 28, 2017, there were approximately twelve payments from **Tashchyan's** Bank of America account to a Capital One credit card in the name of Karlen H. totaling approximately \$30,761, and around eleven payments totaling approximately \$60,200 to two Citibank cards in the name of Karlen H.

83. Karlen H.'s address was listed in Glendale, California. I have confirmed that Karlen H. died on July 31, 2017.

84. Charges to Karlen H.'s credit cards between August 1, 2017 and October 31, 2017, included the following:

- Three payments to Pacific Power totaling approximately \$6,900 for service at 250 NW 1st Street, Corvallis, Oregon, in the name of **Yeghishe Nazaryan**.
- Three payments to Pacific Power totaling approximately \$1,803 for service at 1908 Lowther Place, Philomath, Oregon, in the name of **Mariam Gevorkova**.
- Three payments to Allegiant Air, two for passenger **Mariam Gevorkova**, and one for passenger **Yeghishe Nazaryan**.
- Two payments to American Airlines for **Mariam Gevorkova** and **Yeghishe Nazaryan** for flights from Eugene to Los Angeles.

- Four payments to Wallbeds totaling approximately \$18,800.

85. There were fourteen cash deposits totaling \$76,270 into **Tashchyan's** Bank of America account between July 14, 2017 and October 19, 2017. The deposits provided the funds to make payments on Karlen H.'s credit cards. Cash deposits include \$7,000 on October 2, and \$9,600 on October 10, both made by UCC A.A.L. A.A.L. is employed at the Corvallis Cannabis Club. On October 18, an \$8,000 cash deposit was made in Granada Hills, California by an individual with the same address listed by **Mariam Gevorkova** on her application to Consumers Power for service at 2547 NW Acey Way, Corvallis, Oregon.

86. On October 30, 2017, **Tashchyan** filed claims totaling \$71,703 claiming that the payments to Karlen H.'s Capital One and Citibank cards were fraudulent. Capital One and Citibank reimbursed Bank of America for the "unauthorized" payments.

87. Following the reversed payments, no further payments were made on Karlen H.'s Capital One or Citibank credit cards. On December 19, 2017, the past due balance on Karlen H.'s Capital One card was \$36,688, representing the potential loss to Capital One. On April 3, 2018, the past due balances on Karlen H.'s Citibank cards, including unpaid charges, interest and late fees, were \$39,240 and \$36,124, representing a loss in the amount of \$75,364.

88. After filing the fraud claims, **Tashchyan** opened a second Bank of America checking account in Corvallis. The reimbursed funds from his original account were transferred to the new account. The funds were withdrawn in debit card purchases and cash withdrawals at Bank of America in Corvallis. I have reviewed images taken by Bank of America surveillance cameras at the time **Tashchyan** made the withdrawals. On November 16, 2017, **Yeghishe Nazaryan** was standing with **Tashchyan** when he made one of the withdrawals.

Yuliya P. Capital One Visa Card

89. On November 21, 2016, a Capital One visa card was issued to Yuliya P., with an address listed as 5945 SW Philomath Blvd., Corvallis, Oregon, 97333 – the residence previously occupied by **Barsha** and **Radjapov**.

90. Investigation has determined that Yuliya P. is a thirty-two-year-old female and a citizen of Russia. International travel records revealed that Yuliya P. was not in the United States at the time the credit card was applied for or issued in her name.

91. The credit limit on Yuliya P.'s visa card was \$10,000. Purchases on the card include airline tickets in the name of **Mariam Gevorkova**, **Yeghishe Nazaryan**, D.M. and S.M. Payments on the account were made by **Yeghishe Nazaryan** and UCC G.A. that allowed for the continued use of the card.

92. On March 28, 2017, Yuliya P.'s card was charged \$4,104.95 for a payment to Pacific Power for service at 250 NW 1st Street, Corvallis, Oregon, in the name of **Nazaryan**. The card was also charged for two payments to Furniture Exchange in the amount of \$3,000 and \$3,500.

93. On September 18, 2017, a phone payment in the amount of \$9,800 was posted to the account that reduced the balance due and allowed for additional purchases. On September 19, 2017, \$7,000 was charged on the card payable to Wallbeds Unlimited, 250 NW 1st Street, Corvallis, Oregon, 97330. Following the payment to Wallbeds Unlimited, the \$9,800 phone payment was returned as unable to locate the account. Based on my training and experience, payments are typically returned when the payor provides an incorrect, and often fraudulent, bank account number. The balance on the card on October 29, 2017 was \$20,215.76. No further

payments were made on the card.

Diana W. Cabela's Capital One Visa Card

94. On January 25, 2018, Capital One received an online application for a Cabela's Visa card from Diana W., 1908 Lowther Pl, Philomath, Oregon, 97370. Diana W.'s mother's maiden name was listed as "**Mariam.**" Capital One approved the application and issued Diana W. a Visa with a \$3,000 credit limit. On January 26, 2018, Capital One mailed a letter to Diana W. at her listed address thanking her for joining "our Cabela's CLUB Visa program."

95. Investigation revealed that Diana W. is most likely a synthetic identity. Synthetic identities are created using a combination of real and fabricated information. In this case, a real social security number was used on her application, but investigation determined it was issued to a minor child born in 2014.

96. Purchases on Diana W.'s Cabela's Visa Card in February and March 2018 include four payments to Wallbeds Unlimited totaling \$8,600 and airline tickets for passengers **Mariam Gevorkova, Nazaryan** and A.A.L. for roundtrip travel from Eugene, Oregon to Los Angeles, California. Several internet payments reduced the balance owed allowing for purchases above the \$3,000 credit limit.

97. On April 11, 2018, all payments were returned unpaid resulting in a balance due in the amount of \$16,030.60. All payments made on Diana W.'s Visa were from a JP Morgan Chase account in the name of A.A.L., an employee of the Corvallis Cannabis Club.

US Bank Fraud: Anastasia G.

98. On January 17, 2017, a US Bank Visa credit card was issued to Anastasia G. with an address of 280 NW 1st Street, Corvallis, Oregon, 97330. 280 NW 1st Street is located in the

same building as 250 NW 1st Street and 260 NW 1st Street.

99. Investigation has determined that Anastasia G. is a twenty-seven-year-old female and a citizen of Russia. International travel records revealed that Anastasia G. was not in the United States at the time the credit card was applied for or issued in her name.

100. The credit limit was \$5,000.00. Purchases on the card include \$4,500 in April 2017 to Furniture Exchange. On May 26, 2017, payments were made to American Airlines for passengers including **Issa Barsha**, **“Mari” Gevorkova**, **“Yeghi” Nazaryan**, G.A., and D.M. In June 2017, charges include \$4,000 to My Truck My Load and \$4,004.95 to Pacific Power for credit to the account of **Nazaryan** for power service at 250 NW 1st Street, Corvallis, Oregon.

101. Several phone payments were made from a Citibank account in the name of **Davit Sukiasyan** which reduced the balance owed and allowed for additional purchases. The payments were returned as not authorized. No further payments were made on the card. On October 31, 2017, US Bank charged off \$20,395.81.

Anastasia G. US Bank Checking Account

102. On January 17, 2017, Anastasia G. opened a US Bank checking account. She listed the same address, 280 NW 1st Street, Corvallis, Oregon, 97330. She provided Oregon Driver’s License (ODL) number A5****0. A search of ODL records revealed that license number A5****0 was issued to a male residing in Springfield, Oregon. A search of ODL records for any license issued to Anastasia G. was negative.

103. On May 23, 2017, **Ararat Manukyan** withdrew \$5,000 from his US Bank account and purchased a cashier’s check payable to Anastasia G. The cashier’s check was deposited into her US Bank account. Between July 10, 2017 and July 12, 2017, \$4,800 was

withdrawn in the form of payments to Discover, Capital One, Chase and Citibank cards. The recipients of the payments are unknown.

Oregon State Credit Union Visa Fraud

104. On December 19, 2016, **Mariam Gevorkova** opened a Share Secured Visa with a credit limit of \$5,000 at Oregon State Credit Union (OSCU), Corvallis, Oregon. A “Share Secured Visa” is a credit card that requires the account holder to deposit an amount equal to the credit limit in order to protect OSCU from a loss in the event the card holder does not pay the amount owed on the credit card. **Gevorkova** applied for the Share Secured Visa in person and provided a copy of her Oregon driver’s license. After submitting the application, OSCU mailed the new membership letter to 2394 Hummingbird Dr., Corvallis, Oregon 97330, the address **Gevorkova** listed as her personal residence.

105. On December 31, 2016, **Gevorkova’s** card was charged \$4,800 paid to Divine Kind, a marijuana dispensary. On February 3, 2017, **Gevorkova** made a \$3,985 phone payment on her Visa card. OSCU Pay-By-Phone calls are posted on the customer’s account as “PTDD payments.” PTDD payment calls come into the OSCU call center, and the OSCU representative reads a script that requires the caller to verify their membership and certify that the account they are using to pay their balance is their account. OSCU advised that all payments made on **Gevorkova’s** Visa were Pay-By-Phone.

106. Following the \$3,985 payment, **Gevorkova** charged \$2,900 to Furniture Exchange. **Gevorkova** made two additional phone payments followed by additional charges paid to Divine Kind, American Airlines and \$3,470 paid to Cigarettes Zone, Glendale, California. One of the fraudulent uses of the credit card fraud described by O.J. was to purchase

merchandise, including cigarettes, and sell the merchandise for half price.

107. Beginning on February 17, 2017, **Gevorkova** began to make frequent large charges at Spirit Mountain Casino in Grand Ronde, Oregon. Between February 17 and March 29, **Gevorkova** charged approximately \$33,000 at Spirit Mountain. The charges were followed by phone payments to add available credit to her Visa card.

108. On March 30, 2017, OSCU received a letter from Bank of America stating that charges to their client's, M.H.'s, account were paid to OSCU but were not authorized. OSCU learned at that time that all phone payments made on **Gevorkova's** Visa were paid from a Bank of America account in the name of M.H.

109. OSCU advised that had they known that **Gevorkova** was not using her own account to make the payments, they would not have allowed her to make those payments. OSCU advised that M.H. made the fraud claim just before expiration of the sixty-day window allowed to make a fraud claim. OSCU contacted the reference listed on **Gevorkova's** credit application, "Art Nazaryan," who advised that **Gevorkova** left the country and now lives in Moscow, Russia, which investigation has shown to be false. OSCU reimbursed M.H., resulting in a loss in the amount of approximately \$71,000.

110. Investigation has established that **Mariam Gevorkova** and M.H. know each other. M.H. is the president of the Corvallis Cannabis Club. **Gevorkova** is associated with and works at Corvallis Cannabis Club. As stated above, **Gevorkova** has signed and authorized amendments to the Corvallis Cannabis Club's registration with the Oregon Secretary of State, and "**Marina Gevorkova**" – as stated above, believed to be an alias of **Mariam Gevorkova** – was previously listed as the Authorized Representative of Corvallis Cannabis Club.

111. USPIS conducted periodic surveillance at **Gevorkova's** former address on Hummingbird Drive in Corvallis, Oregon. USPIS observed a white Toyota sedan, California license 7F****3, parked at the residence. The registered owner of the vehicle is M.H.

112. A review of OSCU records revealed that on April 25, 2017, **Akmaljon Radjapov** opened a savings account at OSCU. The initial deposit into the savings account was a Bank of America cashier's check in the amount of \$44,000, purchased by M.H. on April 13, 2017. M.H. purchased the cashier's check after being reimbursed by OSCU for payments made on **Gevorkova's** OSCU Visa card.

113. On April 25, 2017, **Radjapov** also rented safe deposit box number 199 at OSCU. On December 20, 2017, **Radjapov** signed an authorization allowing **Issa Barsha** access to the safe deposit box.

Comenity Bank Fraud

114. Comenity Capital Bank (Comenity) is an industrial bank and subsidiary of Alliance Data Systems. Comenity's primary business is issuing consumer private-label credit cards for clients, generally retail stores.

115. Comenity issued two credit cards to Marina U. with a listed address in North Hollywood, California. On July 6, 2016, Comenity issued a Virgin America Visa with an \$8,000 credit limit. On January 20, 2017, Comenity issued a BJ's Perks MasterCard with a \$22,000 credit limit.

116. Investigation has determined that Marina U. is a twenty-seven-year-old female and a citizen of Russia. International travel records revealed that Marina U. entered the United States in June 2008 and departed in September 2008. She has not returned to the United States.

117. Between July 2016 and March 1, 2017, there was very little activity on the Visa card. Between March 20, 2017 and May 17, 2017, purchases on Marina U.'s Visa account totaled \$46,645. Although there was an \$8,000 credit limit, the charges were approved due to the receipt of eleven payments on the account that were received from a Bank of America account. Large charges were followed by phone payments from the Bank of America account that allowed for additional purchases.

118. Charges on the Visa card include \$4,000 paid to Terwilliger Partners, payments to Furniture Exchange in the amount of \$3,800, \$4,000 and \$3,000, and payments to Virgin America airlines for **"Maria Gevorkova."**

119. Following approval of the above-described purchases, all payments made from the Bank of America account were subsequently returned either for "Stopped Payment" or "Customer advised payment not authorized." Following reversal of the payments, the balance on the Visa was \$46,677. No further payments were made on the card.

120. Between March 5, 2017 and May 17, 2017, purchases on Marina U.'s MasterCard account totaled \$87,061. Although there was a \$22,000 credit limit, the charges were approved due to the receipt of seventeen payments on the account totaling \$75,461 that were received from the same Bank of America account.

121. Charges on the MasterCard include payments to United Airlines and Allegiant Air for **Yeghishe Nazaryan** and D.M. Charges also include multiple payments to Furniture Exchange in the amount of \$3,200, \$4,900 and \$5,000, and a \$3,200 payment to First Hydro.

122. Following approval of the above described purchases, all payments were subsequently returned either for "Stopped Payment" or "Customer advised payment not

authorized." Following reversal of the payments, the balance on the MasterCard on June 8, 2017, was \$87,429.08. No further payments were made on the card.

123. Investigation determined that the Bank of America account that made the payments on Marina U.'s credit cards was opened on September 26, 2016 in the name of G.A. A review of this account revealed that in order for there to be sufficient funds in the account to make the payments on Marina U.'s credit cards, there were multiple cash deposits made at a Bank of America branch located at 324 SW 3rd Street, Corvallis, Oregon. Cash deposits were made by Corvallis Cannabis Club owners and employees, including **Ararat Manukyan, Yeghishe Nazaryan, Lilit Gevorkova and Mariam Gevorkova**. Bank of America employees reported that some of the deposits smelled like marijuana.

124. After reporting the payments to be unauthorized, G.A.'s account was credited with all payments made on Marina U.'s Visa and MasterCard. On May 20, 2017, G.A. was issued a cashier's check for the \$93,389.44 balance and the account was closed. On May 22, 2017, G.A. used the \$93,389.44 check to purchase a cashier's check in the amount of \$83,779.44 payable to herself, and she withdrew \$9,600 cash.

125. On May 22, 2017, G.A. deposited the \$83,779.44 check into her Wells Fargo Bank checking account. Following the deposit, the balance in her account was \$85,907.96. On May 30, 2017, there were eight ATM cash deposits into the account from an ATM in Evanston, Illinois, totaling \$7,780.

126. By June 5, 2017, the balance in the account was reduced to \$3,835.31. Funds in the account were used to make a \$1,749.92 credit card payment to a Barclaycard Visa in the name of M.H., a \$2,838.62 Pacific Union mortgage payment for M.H., and a \$10,000 Capital

One phone payment for “M.H.” Multiple payments were made to Capital One for payment in the name of “Gevorkovrafe,” believed to be an individual who resides at the same address in California that **Mariam Gevorkova** listed as her previous address. Payments were also made to Capital One, Chase, Synchrony Bank, and Cabela’s Visa for unknown recipients. There were also multiple cash withdrawals in the amount of \$9,200, \$7,780, \$5,000, \$2,000.

127. Synchrony Bank, Discover Bank, Capital One Bank, Citibank, U.S. Bank, Bank of America, Wells Fargo, Chase Bank, and Comenity Bank are financial institutions that, at all times referenced in this affidavit and from at least April 2015 through the present, were and remain insured by the Federal Deposit Insurance Corporation. Oregon State Credit Union is a financial institution that, at all times referenced in this affidavit and from at least April 2015 through the present, was and remains insured by the National Credit Union Administration.

Interstate Marijuana Sales Investigation

128. On March 4, 2015, **Mariam Gevorkova** was arrested by the Los Angeles Police Department (LAPD) for violation of California Code 11359HS, Possession of Marijuana for Sale. **Gevorkova** was arrested following the execution of a search warrant at Green Kingdom, a marijuana business located at 6422 Van Nuys Blvd. that was operating as an illegal medical marijuana business. The search warrant was based on a previous LAPD investigation concerning Green Kingdom, which was owned by **Yeghishe Nazaryan**. On January 31, 2015, LAPD informed **Nazaryan** that he was in violation of Proposition D and he was subject to criminal prosecution for continuing to operate.

129. LAPD identified and seized over 200 suspected marijuana plants and THC infused edibles on the premises. **Gevorkova** was standing in a marijuana grow room and was

taken into custody. **Gevorkova** told LAPD that she is not an employee or volunteer, but that she has helped out in the past. D.M. was also arrested on the premises. **Nazaryan** was not on the premises at the time the search warrant was executed and was not arrested.

130. One month after the arrest, the California Cannabis Club, at 220 NW 2nd Street, Corvallis, Oregon, was registered in Oregon.

131. As stated above, O.J. stated that **Issa Barsha** used proceeds from the credit card fraud to start a marijuana grow operation in a warehouse located on 3rd Street in Corvallis, Oregon.³ O.J. stated that some of the marijuana grown at the warehouse is sold out of state. O.J. stated that the marijuana is packaged at **Nazaryan's** dispensary, the Corvallis Cannabis Club. The marijuana is vacuum-sealed and placed into suitcases and driven out of state. The money is then deposited into different bank accounts.

132. O.J. stated that on April 24, 2017, he drove with **Barsha** to Chicago to deliver sixty pounds of marijuana. After receiving the money, **Barsha** deposited some of the money into Chase Bank through ATM deposits, and flew back with approximately \$30,000.

133. I have reviewed an airline passenger ticket report that lists round trip airline tickets in the name of O.J. and **Issa Barsha** for round trip travel from Portland to Chicago on April 26, 2017, and Chicago to Portland on May 1, 2017. The cost of each ticket was \$518.40. Both tickets were paid for with a Chase credit card. O.J. and Barsha were on flights from Portland to Phoenix and Phoenix to Chicago on Apr 26, 2017, and also on a flight from Chicago to Portland on May 1, 2017.

³ Investigators have determined that the marijuana grow at the 3rd Street warehouse, with an address of 711 NW 3rd Street, Corvallis, Oregon 97330, is no longer active.

134. Although the airline tickets conflict with O.J.'s statement that he drove with **Barsha** to Chicago, they confirm that O.J. was with **Barsha** in Chicago in late April 2017, and that they flew back to Oregon on May 1, 2017.

135. On May 1, 2017, \$33,460 in cash was deposited in twenty-five separate transaction into E.M.'s Chase bank account. The deposits were conducted in three separate Chase branches located in Chicago and Norridge, Illinois. As stated above, E.M. participated in the credit card bust-out with **Barsha**, and O.J. described E.M. as **Barsha** and **Radjapov's** bookkeeper.

136. A review of bank records revealed that during 2017, there were multiple cash deposits in Illinois into **Issa Barsha's** PNC Bank account and **Akmaljon Radjapov's** US Bank account. On July 3, 2017, a total of \$22,400 cash was deposited into **Radjapov's** account in Harwood Heights, Bridgeview and Oak Lawn, Illinois. On November 30, 2017, \$30,000 cash was deposited into **Barsha's** PNC bank account in Peoria, Illinois. Based on information provided by O.J., and the fact that **Issa Barsha** and **Akmaljon Radjapov** have no known legitimate business in Illinois, the source of the cash is believed to be from the sale of marijuana.

137. On March 12, 2018, **Radjapov** deposited \$11,000 cash into his account at Oregon State Credit Union, Sunset branch, in Corvallis, Oregon. **Radjapov** pulled several large rubber banded wads of cash from his pocket and asked branch staff if he would be reported to the IRS if he deposited over \$10,000. He was advised that he could deposit as much money as he would like. **Radjapov** deposited \$11,000 cash and put the rest back in his pockets. Oregon State Credit Union staff reported that **Radjapov** smelled strongly of something odd. They did not know what it was, but it was not cigarettes.

138. According to the City of Peoria, Illinois, an individual, M.B., is listed as the “Secretary of Treasury” for the University Food Mart located at 2604 N University Street, Peoria, Illinois. Immediately adjacent to the University Food Mart is a residence with the address of 1220 W. Gift Ave., Peoria, Illinois. 1220 W. Gift Ave. is documented as being owned by University Food Mart Inc.

139. The Peoria Police Department is investigating the illegal distribution or sale of marijuana from the University Food Mart in Peoria, Illinois. To that end, it has conducted four controlled buys of small amounts of cannabis from the University Food Mart. M.B. is one of the subjects of their investigation.

140. On March 15, 2017 a package was sent from the Corvallis Cannabis Club, 220 NW 2nd Street, Corvallis, Oregon, with the sender’s name listed as “Tony Cool” to recipient “George Armani” at 1220 W Gift Ave., Peoria, Illinois. Based on Peoria Police Department records, M.B. has access to the residence located at 1220 West Gift Avenue and was contacted by Peoria Police while inside of the residence on December 13, 2017. These names appear to be fictitious given the similarity of the recipient to the Italian fashion designer “Giorgio Armani.” Based on SA Hsia’s training and experience, the use of fictitious names helps to obscure the true identities of shippers and receivers should a package containing contraband be intercepted.

141. Another package was sent from Corvallis, Oregon to M.B. at the address listed on his driver’s license in Peoria, Illinois. This package was sent from “**Alex Radj**” at 5945 SW Philomath Blvd., Corvallis, Oregon to M.B. at his Peoria, Illinois address on September 16, 2017. The sender of the package is believed to be **Akmaljon Radjapov**, as **Radjapov** previously told a Corvallis Police Department officer that he goes by “**Alex**” or “**Alec**.”

142. According to telephone records for the phone number subscribed to **Akmaljon Radjapov** at 5945 SW Philomath Blvd., the user had communicated with a telephone subscribed to “G.B.” but believed to be used by M.B., about 15 times between February 19, 2018 and April 29, 2018. Based on my training and experience, I believe that, in order to coordinate the sending of packages and the deposit of United States currency into bank accounts held by members of the conspiracy, **Barsha** or **Radjapov** have actively communicated with M.B. and others in Peoria, Illinois.

1908 Lowther Place, Philomath, Oregon 97370

143. According to the United States Energy Information Administration, the statistical and analytical agency within the United States Department of Energy, the average annual electricity consumption for a U.S. residential utility customer in 2016 was about 897 kWh per month. Annual electricity consumption for the average residential utility customer in 2016 ranged from 505 to 1,240 kWh per month.

144. Pacific Power records revealed that on August 10, 2017, **Mariam Gevorkova** established utility service at 1908 Lowther Place, Philomath, Oregon, 97370, a single-family residence that contains 1,064 square feet. For the six-month period from September 19, 2017 through February 22, 2018, Pacific Power charges totaled \$4,798.44 for a monthly average of \$799.74. In February 2018, the kWh usage for 1908 Lowther Place was billed as having consumed 7,220 kWh that month, which was over eight times the national average of electricity consumption for a residential utility customer. Based on SA Hsia’s training and experience, the above-listed electricity consumption and cost for a 1,064 square foot residence is extremely high, and marijuana grow operations often require exceptionally high power usage.

145. In May of 2018, the City of Philomath Water Department responded with records for utility service at 1908 Lowther Place, Philomath, Oregon, 97370. According to their records, the water service was currently in the name of an unknown individual listed a spouse as Diana W. They provided a date of birth, a California Driver's License, as well as a Social Security Number on their utility application form. Based on law enforcement database checks, the California Driver's License number did not match either person listed on the application. Diana W. is also one of the identities utilized in the credit card bust-out fraud.

146. On May 8, 2018, law enforcement was monitoring electronic surveillance equipment and noticed a black Chevrolet truck matching the description of the one driven by **Yeghishe Nazaryan** with Oregon license plates 5****Z, pull into the driveway of 1908 Lowther Place, Philomath, Oregon at approximately 12:00pm. This vehicle had been seen earlier that morning by law enforcement parked in front of the Corvallis Cannabis Club located at 220 NW 2nd Street, Corvallis, Oregon. The driver had a bald head with a black beard while the passenger, believed to be A.A.L., employee at Corvallis Cannabis Club, was wearing a black t-shirt along with a black hat.

147. Between about 2:30 p.m. and 3:00 p.m., the driver and the passenger were observed loading the truck with a lawn mower, a red gas can, and various other items. Just after 3:00 p.m., the truck left 1908 Lowther Place, Philomath, Oregon, and headed back toward Corvallis, Oregon. Law enforcement surveillance observed the vehicle travel directly from 1908 Lowther Place, Philomath, Oregon to 1115 SW Stopp Place, Corvallis, Oregon. Corvallis Street Crimes Detectives observed the driver and the passenger unloading the truck at the residence at about 3:14 p.m. Surveillance units also recognized a white female with dark colored hair

assisting the occupants with unloading the items from the truck. Detectives later identified the female as **Mariam Gevorkova**.

148. On multiple dates, including May 1 and 2, 2018, an individual matching A.A.L.'s description was observed moving items between the front and rear of 1908 Lowther Place, Philomath, Oregon, while also tending to the yard. A white 2000 Acura bearing Oregon license plates 5****T, registered to A.A.L. and another individual, was observed by surveillance parked in the driveway of 1908 Lowther Place. This same vehicle was also observed on multiple occasions parked in front of the Corvallis Cannabis Club in Corvallis, Oregon.

149. On May 24, 2018, law enforcement walked around the 1908 Lowther Place, Philomath, Oregon residence on the public sidewalk. As they were passing by the residence, distinguishable fan sounds coming from the rear of the Lowther Place residence could be heard. The odor of marijuana was also readily apparent according to the law enforcement officer as he passed by the side of the house.

250 NW 1st Street, Corvallis, Oregon, 97330

150. Pacific Power records show that on October 26, 2015, **Yeghishe Nazaryan** established service at 250 NW 1st Street, Corvallis, Oregon, 97330. Charges average over \$3,000 per month, with the electricity usage averaging about 32,752 kWh per month. The power consumption is greatly elevated at 250 NW 1st Street based on the lack of a storefront at the address, the low foot traffic witnessed during surveillance, and the lack of a legitimate manufacturing or other business operation at the address. Credit cards in the name of Karlen H., Anastasia G., Yuliya P., Anastasia S., and Yana K. were used to pay for power at this address.

151. According to the City of Corvallis Water Department, utility records for 250 NW

1st Street, Corvallis, Oregon were in the name of **Yeghishe Nazaryan**. The water account was paid for by several different credit cards, to include a payment in July 2016 from **Lilit Gevorkova**, a payment in September 2017 by Karlen H.'s MasterCard, and a payment in February 2018 from a Visa card in the name of Diana W.

152. On May 24, 2018, law enforcement walked around the 250 NW 1st Street, Corvallis, Oregon location and detected the odor of marijuana near the rear, alleyway door on the west side of the building. During additional surveillance on that same day, law enforcement observed D.M. near the alleyway door

OMMP and OLCC Checks

153. According to the Oregon Medical Marijuana Program (OMMP), as of June 6, 2018, none of the addresses submitted by law enforcement were located in their database. Addresses that were submitted to OMMP included: 2547 NW Acey Way; 220 NW 2nd Street; 250 NW 1st Street; 260 NW 1st Street; 280 NW 1st Street; 2664 NW Garryanna Drive, Apt 2; 1115 SW Stopp Place; and 1908 Lowther Place, Philomath.

154. The same addresses were submitted to the Oregon Liquor Control Commission (OLCC). According to OLCC, as of June 6, 2018, the only address licensed with them was the Corvallis Cannabis Club, located at 220 NW 2nd Street, Corvallis, Oregon. All of the other addresses listed in the previous paragraph, with the exception of 220 NW 2nd Street, did not have a pending application or license with OLCC.

Conclusion

155. Based on the foregoing, I have probable cause to believe, and I do believe, that **Issa J. Barsha, Akmaljon Radjapov, Yeghishe Nazaryan, Mariam Gevorkova, Ararat**


Manukyan, Lilit Gevorkova, Shokhrukh Tashpulatov, Davit Sukiasyan, and Gevorg Tashchyan committed Conspiracy, Mail Fraud, Wire Fraud, and Bank Fraud, in violation of 18 U.S.C. §§ 371, 1341, 1343, and 1344, and Manufacture, Distribution, or Possession with the Intent to Manufacture, Distribute, Dispense a Controlled Substance (Marijuana) and Conspiracy to Manufacture, Distribute, or Possess with the Intent to Manufacture, Distribute, Dispense a Controlled Substance (Marijuana), in violation of 21 U.S.C. §§ 841(a)(1) and 846. I therefore request that the Court issue a criminal complaint and arrest warrant for **Issa J. Barsha, Akmaljon Radjapov, Yeghishe Nazaryan, Mariam Gevorkova, Ararat Manukyan, Lilit Gevorkova, Shokhrukh Tashpulatov, Davit Sukiasyan, and Gevorg Tashchyan.**

156. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by Assistant United States Attorney (AUSA) Gavin W. Bruce, and AUSA Bruce advised me that in his opinion the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

Request for Sealing


157. It is respectfully requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested criminal complaint and arrest warrant. I believe that sealing these documents is necessary because the information to be seized is relevant to an ongoing investigation, and any disclosure of the information at this time may cause flight from prosecution, cause destruction of or tampering with evidence, cause intimidation of potential witnesses, or otherwise seriously jeopardize an investigation.

Premature disclosure of the affidavit, the criminal complaint, and the arrest warrant may adversely affect the integrity of the investigation.



JEFFREY SCHILTZ
Special Agent, FBI

Subscribed and sworn to before me this 11 day of June, 2018.



THOMAS M. COFFIN
United States Magistrate Judge